

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

<p>NIMITZ TECHNOLOGIES LLC,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>CNET MEDIA, INC.,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 1:21-cv-01247-CFC</p>
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RESPONSE TO ORDER TO SHOW CAUSE (D.I. 20)

Plaintiff Nimitz Technologies LLC and its undersigned counsel hereby respond to the Court's Order to Show Cause (D.I. 20).

The undersigned counsel takes responsibility for not timely responding to the Court's May 13, 2022 Order. The explanation for the failure is that the Counsel focused on obtaining the necessary information to provide a complete and correct response to the Court's May 13, 2022 Oral Order and overlooked the "within five days" language of the Oral Order.

Specifically, counsel acted immediately to collect the information required to comply with the two Standing Orders. Because the two Standing Orders are new, counsel had determine the scope of the required disclosures (for example confirming that the Rule 7.1 Standing Order related to ownership interests and not financial interests). Counsel also confirmed that Plaintiff had not entered into any arrangements with a Third-Party Funder, as defined in the Court's Standing Order Regarding Third-Party Litigation Funding Arrangements. In pursuing his investigation, counsel focused on the Orders themselves and particularly (1) that the Court's Standing Order Regarding Third-Party Litigation Funding Arrangements included a due date of 45 days after the Order, which

would be June 2, 2022, and (2) that the Standing Order Regarding Disclosure Statements Required By Federal Rule of Civil Procedure 7.1 did not include any deadline. In considering the Orders, counsel overlooked that the Court's Oral Order itself included the "within five days" language.

Counsel apologizes for the delay in filing the required disclosures, and repeats that the error was inadvertent overlooking of the deadline in the Oral Order.

Dated: May 25, 2022

Respectfully submitted by:

/s/ George Pazuniak
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